

Exhibit 13

Fw: [EXTERNAL] Huddleston v. FBI, Case 4:20-cv-00447-ALM

From: Ty Clevenger (tyclevenger@yahoo.com)
To: james.gillingham@usdoj.gov
Date: Friday, January 5, 2024 at 12:35 PM EST

Did the FBI have anything to say about this? I ask because we plan to seek the production of metadata and file names first, and we believe it could be produced pretty quickly without much need for human review.

----- Forwarded Message -----

From: Gillingham, James (USATXE) <james.gillingham@usdoj.gov>
To: Ty Clevenger <tyclevenger@yahoo.com>; Callahan, Cossette (USATXE) <Cossette.Callahan@usdoj.gov>
Sent: Friday, December 8, 2023 at 10:25:46 AM EST
Subject: RE: [EXTERNAL] Huddleston v. FBI, Case 4:20-cv-00447-ALM

Ty,

Thanks for reaching out. I am still getting up to speed, but am speaking with the client today. I should have a better feel for the status. Once I do, I will let you know what timing looks like and we can discuss the status report.

James Gillingham

903-510-9346

From: Ty Clevenger <tyclevenger@yahoo.com>
Sent: Thursday, December 7, 2023 5:24 PM
To: Gillingham, James (USATXE) <JGillingham@usa.doj.gov>; Callahan, Cossette (USATXE) <CCallahan@usa.doj.gov>
Subject: [EXTERNAL] Huddleston v. FBI, Case 4:20-cv-00447-ALM

Have either of you heard anything back from the FBI regarding the matter below? We are supposed to file a response to the court's order by next Tuesday.

----- Forwarded Message -----

From: Ty Clevenger <tyclevenger@yahoo.com>
To: Parker Andrea (USATXE) <andrea.parker@usdoj.gov>
Sent: Wednesday, November 29, 2023 at 03:16:58 PM EST

Subject: Huddleston order

Andrea,

I hope you had a good Thanksgiving and I hope things are well in Beaumont. I got back from medical leave about a month ago and I've been trying to get caught up. Easier said than done.

I spoke with my IT expert this afternoon and he recommended that we prioritize the production of metadata and file names. He said the metadata and file names could be produced in a matter of hours, and they should not contain any exempt information, particularly in the case of the personal laptop image.

Once we had the file names, we could further prioritize the documents that we are interested in. A lot of the files are going to be junk, I'm sure. Please let me know your thoughts.

Ty

Huddleston

From: Ty Clevenger (tyclevenger@yahoo.com)
To: james.gillingham@usdoj.gov
Date: Friday, August 16, 2024 at 12:46 PM EDT

James,

As you may recall, we proposed that the FBI produce all metadata and file names in lieu of processing all files, after which we could narrow our search. That could save the hassle of reviewing hundreds of thousands of documents. Please ask the FBI if it is willing to reconsider. Thank you.

Ty

[Yahoo Mail: Search, Organize, Conquer](#)

Huddleston v. FBI

From: Ty Clevenger (tyclevenger@yahoo.com)
To: james.gillingham@usdoj.gov
Date: Monday, September 9, 2024 at 10:41 PM EDT

James,

Have you heard anything back from the FBI about our proposal to start with just metadata and file names from the electronic devices? For the deal to be worthwhile to my clients, they would want the metadata and file names before the election.

Ty

Re: [EXTERNAL] Huddleston

From: Ty Clevenger (tyclevenger@yahoo.com)
To: james.gillingham@usdoj.gov
Date: Sunday, October 20, 2024 at 03:35 PM EDT

James,

We really wanted the Seth Rich metadata before the election. If the FBI cannot produce it by the end of the week, then our offer will expire at that time. Let me know if you want to discuss further.

Ty

On Wednesday, September 25, 2024 at 12:07:12 PM EDT, Gillingham, James (USATXE) <james.gillingham@usdoj.gov> wrote:

Ty,

Yes, I got the information I need to respond to your question regarding Paragraph 7 of the Seidel Declaration. I just need to synthesize into an email to you. I will try and get it out to you this afternoon, otherwise it will be Friday because I am traveling tomorrow.

As for the metadata, I am still waiting to get more information from the technical experts. I do think that if you were willing to limit what you are looking for it could help the conversation. But as of now, it appears you want almost 100 metadata fields for all files on the computers regardless of file size or type, which is a bigger ask. However, I need to hear back from the technical people before I know whether there is a path forward.

James Gillingham
903-510-9346

From: Ty Clevenger <tyclevenger@yahoo.com>
Sent: Wednesday, September 25, 2024 10:45 AM
To: Gillingham, James (USATXE) <JGillingham@usa.doj.gov>
Subject: Re: [EXTERNAL] Huddleston

Have you heard back from the FBI about this? Or about the proposal to produce metadata?

On Monday, September 16, 2024 at 10:44:15 AM EDT, Gillingham, James (USATXE) <james.gillingham@usdoj.gov> wrote:

Ty, I will follow-up.

James Gillingham

903-510-9346

From: Ty Clevenger <tyclevenger@yahoo.com>
Sent: Monday, September 16, 2024 9:41 AM
To: Gillingham, James (USATXE) <JGillingham@usa.doj.gov>
Subject: [EXTERNAL] Huddleston

James,

Paragraph 7 of Michael Seidel's declaration (Dkt. #185-1) references documents that were collected from the MPD, including a report of examination of the laptop. So far as I can tell, those documents were not included in the Vaughn index and have never been mentioned before. Please ask the FBI to clarify whether the documents were omitted from the Vaughn index and, if so, why they were omitted.

Ty